

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

## UNITED STATES DISTRICT COURT

for the  
District of North Dakota

Eastern Division

Mitchell S. Sanderson

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

\_\_\_\_\_  
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Walsh County Sheriff's Department, Ron Jurgens

\_\_\_\_\_  
Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☐ Yes ☒ No

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Mitchell S. Sanderson
Street Address	214 Sandwood Circle
City and County	Park River - Walsh County
State and Zip Code	North Dakota 58270
Telephone Number	701-331-0410
E-mail Address	mitchell_sanderson@hotmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

---

## Defendant No. 1

Name	Walsh County Sheriff "Ron Jurgens"
Job or Title <i>(if known)</i>	Walsh Sheriff
Street Address	638 Cooper Ave.
City and County	Grafton - Walsh County
State and Zip Code	North Dakota 58237
Telephone Number	701-352-2041
E-mail Address <i>(if known)</i>	rjurgens@nd.gov

## Defendant No. 2

Name	N/A
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 3

Name	N/A
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	N/A
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

First and Fourteenth Amendments "Bill of RIGHTS" US Constitution, 18 USC 242, 42 USC Sec. 1983, Sec. 1985, & Sec. 1986, 18 US Code Sec. 241. ND Constitution Article I Section 4, NDCC 15-10.4(3), Amendment XIV Section 1., The Supreme Court has established "an implied private right of action" under Title VI., 28 U.S.C. §§ 2201 and 2202. Sheriff committed Evidence Tampering Title 18 U.S.C § 1503, NDCC 12.1-09-01, NDCC 12.1-09-03, NDCC 12.1-08-01. See Everyday Learning Corp. v. ~~\_\_\_\_\_~~

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Mitchell S. Sanderson, is a citizen of the State of *(name)* North Dakota.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* N/A, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* Ron Jurgens, is a citizen of the State of *(name)* North Dakota. Or is a citizen of *(foreign nation)* \_\_\_\_\_.

## b. If the defendant is a corporation

The defendant, (name) N/A, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

## 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

TBD

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The Walsh County Sheriff like many government officials, maintains a Facebook account from which he regularly posts information concerning, among other things, the activities of his office. This Facebook page is viewable by the public, and anyone with a Facebook account can post comments in response to the Sheriff's posting. Sanderson was unblocked after an initial filing was done upon the Walsh Sheriff's office which is an admission of guilt! Sanderson then commented on the Walsh Sheriff Page which is a Governmental page and then again his comments were deleted/blocked/ hidden in violation of the First and Fourteenth Amendments. Sanderson advised the Sheriff's attorney of this and then he was again unblocked! THIS IS VIEWPOINT DISCRIMINATION!

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Sheriff has "deleted or blocked comments made by" Mr. Sanderson - while simultaneously allowing comments from others to remain publicly available. This censorship represents viewpoint-based discrimination that runs afoul of the First Amendment and Fourteenth Amendment to the United States Constitution. The Sheriff's Facebook page is available at <http://www.co.walsh.nd.us/>. Appropriate declaratory and injunctive relief is warranted! Mr. Sanderson desires to post comments to the Sheriff's Facebook page. Sanderson demands compensation under the law for his Constitutional Rights being violated again in addition to other crimes as listed above



Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

At all times the Sheriff has acted under color of state law. As a result of the actions of the Sheriff, the plaintiff is suffering irreparable harm for which there is no adequate remedy at law. Enter an injunction, (a) enjoining the defendant to restore comments to the Facebook page and the defendant from hiding or deleting public comments on the basis of their viewpoint some time before June 29 20204 well after a case was filed on Constitutional violations. Award the plaintiff his costs and Pro Se monetary award for time to research and file this Complaint and be compensated pursuant to 42 U.S.C. § 1988. Equal protection under the law should award Pro Se legal costs and fees for Plaintiff's time.

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/25/2024

Signature of Plaintiff

Printed Name of Plaintiff

Mitchell S. Sanderson  
MITCHELL S. SANDERSON

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address